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VIA ECF

Hon. Georgette Castner
United States District Judge
District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

RE: *United States of America ex rel. Michael Andriola vs. Ferreira
Construction et al.*, No. 3:23-cv-3834-GC-JBD (D.N.J.) – Pre-Motion
Response (Motion to Dismiss First Amended Complaint)

Dear Judge Castner:

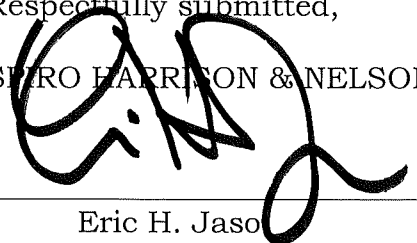
We represent Relator Michael Andriola in the above-captioned *qui tam* case. In compliance with the Court's Individual Preferences concerning dispositive motions, this letter outlines Relator's anticipated responses to Defendants' anticipated Motion to Dismiss the First Amended Complaint, as described in defense counsel's pre-motion letter (ECF 26).

Because Defendants' pre-motion letter does not raise any arguments or claims substantively different than those made in their original Motion to Dismiss (ECF 21), Relator respectfully refers the Court to his response letter dated December 23, 2024 (ECF 23). Relator does not anticipate further amending his complaint in response to the renewed Motion to Dismiss, but reserves his right to so move in the event Defendants raise additional issues.

Relator has no objection to the Court's granting Defendants a reasonable extension in the page limits for briefing the Motion to Dismiss, but respectfully requests a similar extension for his papers if one is granted.

Respectfully submitted,

SPIRO HARRISON & NELSON



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